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Nevada Bar No. 2566  
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3 STOVALL & ASSOCIATES  
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4 Las Vegas, NV 89107  
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Attorney for Plaintiff  
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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 ROBERT BARCELON, an individual )  
11 ) Case no.: 2:18-cv-01493-GMN-DJA  
Plaintiff, )  
12 Vs. )  
13 LANDFORCE CORPORATION )  
14 Individually; ALBERT LEON HARRIS, )  
Individually; DOES I-X and ROE )  
15 CORPORATIONS I-X, inclusive, )  
16 Defendants. )  
17 )

18 **PLAINTIFF'S MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS' FOUR**  
19 **MOTIONS FILED WITH THE COURT AS DOCUMENTS 68, 69, 70, 71**  
20 **(Third Request)**

21 COMES NOW Plaintiff, by and through his attorneys, STOVALL & ASSOCIATES, and  
22 hereby files unopposed motion to Extend Time to respond to Defendants' four motions filed on  
23 April 16, 2020 as documents 68, 69, 70, 71 from May 11, 2020 to May 12, 2020.

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1 This motion is based upon the pleadings and papers on file herein, the Memorandum of  
2 Points and Authorities attached hereto, and any oral argument this Court may entertain at the  
3 hearing of this Motion.

4 Dated this 11<sup>th</sup> day of May 2020.

5 STOVALL & ASSOCIATES

6 /s/ Ross Moynihan

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8 ROSS H. MOYNIHAN, ESQ.  
9 Nevada Bar No. 11848  
10 2301 Palomino Lane  
11 Las Vegas, Nevada 89107  
12 *Attorney for Plaintiff*

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14 **DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF PLAINTIFF'S**  
15 **MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS' MOTIONS**  
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17 ROSS MOYNIHAN, declares and states as follows:

18 1. I am an attorney at the Law Office of Stovall & Associates, counsel for Plaintiff,  
19 and am licensed to practice law in the State of Nevada.

20 2. On April 16, 2020 defendants filed four motions with oppositions due on April  
21 30, 2020.

22 3. Plaintiff requested two extensions of time to respond to the motions, the first from  
23 April 30 to May 4, 2020 and the second from May 4 to May 11, 2020.

24 4. Both extensions were agreed to by the defendants and were then ordered by the  
25 court.

26 5. Plaintiff requires an additional day to May 12, 2020 to complete the oppositions.  
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1 Based upon the declaration of counsel, good cause exists for the extension of plaintiffs'  
2 time from May 11, 2020 to May 12, 2020 to respond to the defendant's motions filed as  
3 documents 68, 69, 70, 71 and plaintiff requests that the court grant this unopposed motion.  
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5 Dated this 11th day of May 2020.

6 STOVALL & ASSOCIATES

7 /s/ Ross Moynihan  
8 ROSS H. MOYNIHAN, ESQ.  
9 Nevada Bar No. 11848  
10 2301 Palomino Lane  
11 Las Vegas, Nevada 89107  
12 *Attorney for Plaintiffs*

13 **IT IS SO ORDERED.**

14 DATED: May 12, 2020

15   
16 Daniel J. Albrechts  
17 United States Magistrate Judge

18 **CERTIFICATE OF SERVICE**

19 I HEREBY CERTIFY that on the 11<sup>th</sup> day of May 2020, service of the foregoing  
20 Plaintiff's Motion to Extend Time was made this date through the court's electronic filing system  
21 to the following:

22 Bauman Loewe Witt & Maxwell, PLLC  
23 Michael C. Mills, Esq.  
24 3650 N. Rancho Dr., Ste. 114  
25 Las Vegas, NV 89130  
26 *Attorney for Defendant Albert Harris*

27 /s/ Ross Moynihan  
28 An employee of STOVALL & ASSOCIATES